



United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

MEMO ENDORSED

November 7, 2019

BY ECF

The Honorable Laura Taylor Swain  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY
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Re: *United States v. Winston Anthony Rose, 19 Cr. 580 (LTS)*

Dear Judge Swain:

On September 5, 2019, the parties appeared before the Court for an initial conference. At that time, the Court directed the parties to submit a status report on November 7, 2019 and set a subsequent status conference for December 5, 2019. The Government is in the process of producing discovery materials, and the parties are engaged in discussions concerning a possible disposition of this matter. On November 4, 2019, the Court appointed Meredith Heller, Esq., as defense counsel in light of a conflict in the defendant's prior representation. In light of these ongoing matters and the recent appointment of new counsel, the parties respectfully request that the December 5, 2019 status conference be adjourned for approximately forty-five days. The Government also requests, with the consent of defense counsel, that time be excluded under the Speedy Trial Act in order to allow for the production and review of discovery and for discussions concerning a possible disposition to continue. *See* 18 U.S.C. § 3161(h)(7).

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

THE APPLICATION IS GRANTED. THE CONFERENCE IS adjourned to  
11/9/20 at 3:00pm IN COURTROOM 17C. THE COURT FINDS PURSUANT TO 18  
U.S.C. § 3161(h)(7)(A) THAT THE ENDS OF JUSTICE SERVED BY AN EXCLUSION OF THE TIME  
FROM TODAY'S DATE THROUGH 11/9/20 OUTWEIGH THE BEST INTERESTS OF THE PUBLIC AND  
THE DEFENDANT IN A SPEEDY TRIAL FOR THE REASONS STATED ABOVE. SO ORDERED.

LSW 11/7/19  
LAURA TAYLOR SWAIN, USDJ

By: \_\_\_\_\_s/\_\_\_\_\_  
Daniel G. Nessim  
Assistant United States Attorney  
(212) 637-2486

cc: Meredith Heller, Esq. (by ECF)